

EXHIBIT 43

1 Teresa Li (Bar No. 278779)
2 teresa@lawofficesofteresali.com
3 LAW OFFICES OF TERESA LI P.C.
4 315 Montgomery Street, 9th Floor
5 San Francisco, California 94104
6 Telephone: 415.423.3377
7 Facsimile: 888.646.5493

8 Attorneys for Plaintiffs
9 RUBEN JUAREZ AND ISELA
10 HERNANDEZ

11 Daniel K. Balaban
12 Daniel@dbaslaw.com
13 BALABAN & SPIELBERGER, LLP
14 11999 San Vincente Boulevard
15 Suite 345
16 Los Angeles, CA 90049
17 Telephone: 424.832.7677
18 Facsimile: 424.832.7702

19 Attorneys for Plaintiffs
20 RUBEN JUAREZ and ISELA HERNANDEZ

21 UNITED STATES DISTRICT COURT
22 CENTRAL DISTRICT OF CALIFORNIA

23 RUBEN JUAREZ, an individual and
24 ISELA HERNANDEZ, an
25 individual,

26 Plaintiff,

27 v.

28 PRECISION VALVE &
AUTOMATION, Inc., a corporation
and DOES 1-20,

Defendants.

Case No. CV-03342-ODW(GJSX)

**PLAINTIFF RUBEN JUAREZ'S
RESPONSE TO DEFENDANT'S
REQUEST FOR
INTERROGATORIES, SET TWO (2)**

**PROPOUNDING PARTY: DEFENDANT, PRECISION VALVE &
AUTOMATION**

RESPONDING PARTY: PLAINTIFF, RUBEN JUAREZ

1 **SET NUMBER: TWO**

2 Pursuant to Federal Rules of Civil Procedure Rule 33, Plaintiff RUBEN
3 JUAREZ hereby responds to Defendant PRECISION VALVE & AUTOMATION,
4 INC.'s request for interrogatories, set two (2).

5 **RESPONSES TO INTERROGATORIES**

6 **INTERROGATORY NO. 16**

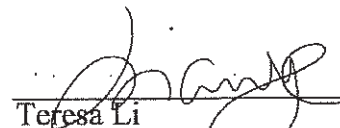
7 Identify I detail all EVIDENCE which establishes or in any way relates to
8 whether plaintiffs' lawsuit is barred by the two-year statute of limitations found in
9 California Code of Civil Procedures section 340.8.

10 **RESPONSE TO INTERROGATORY NO. 16:**

11 The interrogatory may seek information that is protected by attorney client
12 privilege or work product doctrine. Without waiving the objections and subject
13 thereto, plaintiff responds: all the deposition transcripts of Plaintiff Ruben Juarez,
14 all of the medical records of plaintiff Ruben Juarez produced in discovery or
15 obtained via subpoenas; all the exhibits attached to Plaintiff Ruben Juarez's
16 deposition; all the documents produced by PVA so far; and all the documents
17 produced by PVA so far

18
19 Dated: May 8, 2018

LAW OFFICES OF TERESA LI, P.C.

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21 
22 Teresa Li
23 Attorney for Plaintiffs
24 RUBEN JUAREZ AND ISELA
25 HERNANDEZ
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1 **PROOF OF SERVICE**

2 RE: *Juarez v. PVA*

3 I am employed in the County of Alameda, State of California. I am over the age of 18
4 years and not a party to the within action. My business address is 6701 Koll Center Parkway,
5 Suite 250, Pleasanton, CA 94566.

6 On May 8, 2018, I served a copy of the following document: **PLAINTIFF RUBEN**
7 **JUAREZ'S RESPONSE TO DEFENDANT'S REQUEST FOR INTERROGATORIES,**
8 **SET TWO (2); PLAINTIFF RUBEN JUAREZ'S RESPONSE TO DEFENDANT'S**
9 **REQUEST FOR PRODUCTION OF DOCUMENTS AND ELECTRONICALLY**
10 **STORED INFORMATION (ESI), SET THREE (3); PLAINTIFF ISELA HERNANDEZ'S**
11 **RESPONSE TO DEFENDANT'S REQUEST FOR INTERROGATORIES, SET TWO (2);**
12 **PLAINTIFF ISELA HERNANDEZ'S RESPONSE TO DEFENDANT'S REQUEST FOR**
13 **PRODUCTION OF DOCUMENTS AND ELECTRONICALLY STORED**
14 **INFORMATION (ESI), SET TWO (2) on the below listed parties in this action as follows:**

15 Alex P. Catalona
16 BECHERER KANNETT & SCHWEITZER
17 1255 Powell Street
Emeryville, CA 94608

18 X **BY MAIL:** I placed such envelope on the above date with postage fully prepaid,
19 for deposit in the U.S Postal Service at my place of business in Pleasanton,
20 California, following the ordinary business practices of my place of business. I
21 am readily familiar with the business practice at my place of business for
collection and processing of correspondence for mail with the U.S. Postal Service.
Under the practice, such correspondence is deposited with the U.S. Postal Service
the same day it is collected and processed in the ordinary course of business.

22 **BY FAX:** I caused such document to be transmitted by facsimile transmission to
23 a facsimile machine maintained by the person on whom it is served at the
24 facsimile number as last given by that person on any document which he or she
has filed in the case. I caused such by sending a true copy from Teresa Li's
facsimile number, and that transmission reported as complete and without error to
the following facsimile number: _____.

25 **BY PERSONAL SERVICE:** I caused such document to be delivered by hand to
26 the above listed party.

27 I declare under penalty of perjury under the laws of the State of California that the
28 foregoing is true and correct and that this document was executed at Pleasanton, California on

1 May 8, 2018.

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Teresa Li

RECEIVED
MAY 14 2018
BY BKS